

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

|                               |   |                            |
|-------------------------------|---|----------------------------|
| 3M COMPANY,                   | ) |                            |
|                               | ) |                            |
| Plaintiff,                    | ) |                            |
|                               | ) |                            |
| v.                            | ) | CIVIL ACTION NO. 1:11cv627 |
|                               | ) | (TSE/JFA)                  |
| NAME.COM LLC, D/B/A PROTECTED | ) |                            |
| DOMAIN SERVICES, et al.,      | ) |                            |
|                               | ) |                            |
| Defendants.                   | ) |                            |

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**PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION**

By this motion, Plaintiff 3M Company ("3M") seeks a preliminary injunction prohibiting Defendants, their officers, agents, servants, employees, attorneys, and all other persons who are in active concert or participation with any of them, from (1) using the mark 3M and any other mark that is confusingly similar to or likely to cause dilution of Plaintiff's famous 3M mark, including but not limited to using the mark 3M on any gambling-related website or providing Internet hosting services or any similar or related services for any such website; (2) using or transferring the Infringing Names (as that term is defined in the Complaint), and any other domain name or mark that includes the marks 3M, MMM, or any other confusingly similar marks, to anyone other than Plaintiff; and (3) providing Internet hosting services or any similar or related services to the Infringing Websites (as that term is defined in the Complaint).

In support of this motion, 3M submits herewith an accompanying memorandum and its referenced exhibits, and a proposed order.

DATED: June 24, 2011.

Respectfully submitted,

/s/

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